

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I 5 POST OFFICE SQUARE, SUITE 100 BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

URGENT LEGAL MATTER REQUIRES PROMPT RESPONSE FEB 0 3 2017

Brad Drummond, President Aramark Uniform & Career Apparel, LLC 110 Glenn Street Lawrence, MA 01843-1022

Re: Clean Air Act Reporting Requirement

Dear Mr. Drummond:

The United States Environmental Protection Agency ("EPA") is evaluating whether Aramark Uniform and Career Apparel, LLC ("Aramark") is in compliance with the Clean Air Act ("the Act") and state and federal regulations promulgated under the Act. These requirements include but are not limited to the federally enforceable sections of the Massachusetts state implementation plan ("SIP") regulations at 310 CMR 7.00 et. seq.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether a facility is in compliance with the Clean Air Act.

EPA issued a previous Clean Air Act Reporting Requirement to Aramark on August 25, 2011. EPA is now requiring Aramark to provide updates to some of the information requested in 2011.

Within 30 days of receiving this letter, Aramark is required to provide the following information about the facility located at 110 Glenn Street in Lawrence, Massachusetts. The term "towels" means shop, furniture or print towels or wipers of the types used by commercial or industrial businesses to remove oils, paints, inks and/or solvents from machinery and equipment. Where appropriate submit responses in an electronic spreadsheet format that is compatible with Microsoft Excel.

1) Provide the following information for the time period between September 1, 2011 and the present:

- a) The quantity (in pounds) of soiled towels received and processed <u>per month</u> and <u>per year</u>. For the purposes of responding to this Reporting Requirement, the term "processed" shall be defined as "laundered and dried". If Aramark distinguishes between categories of towels provided to customers in any way (e.g., print towels, furniture towels, garage towels, auto-body towels) please provide the summary of towels processed using such categories, including the color(s) of these towels;
- b) The typical weight of a load of soiled towels;
- c) The washing time for each category of soiled towels processed;
- d) The drying time for each category of soiled towels processed; and
- e) Identify factors that limit the facility's capability to process soiled towels, such as equipment capacities, load cycle times, and wastewater discharge limits. Specify how each such limit impacts the quantity of soiled towels that can be processed per day.
- 2) Provide the following information about the washers and dryers used for laundering soiled towels in the time period September 1, 2011 to present:
 - a) Make, model, capacity and any other operational specifications of each washer and dryer;
 - b) Date of purchase of each washer and dryer;
 - c) Date of installation of each washer and dryer;
 - d) Data that each washer or dryer was put into operation; and
 - e) Date that each washer or dryer was taken out of service, if applicable.
- 3) If Aramark accepts soiled towels for processing offsite, provide the names and addresses of the processing locations, as well as the quantity and category of all types of soiled towels sent to each for the calendar years 2011 through 2016.
- 4) Provide a list of all fuel burning boilers and generators currently in operation at the facility. For each piece of equipment, indicate:
 - a) Manufacturers make and model number;
 - b) Serial number:
 - c) Type of fuel burned; and
 - d) Ouantity of fuel burned annually between 2011 and the present.
- Provide copies of all correspondence Aramark (or any of its predecessors) has had with state and federal environmental agencies regarding air emissions, from September 1, 2011 to the present, including copies of:
 - a) All permits issued;
 - b) All permit applications; and
 - c) Any requests for permit modifications.

Mail the submissions required by this letter to:

Susan Studlien, Director Office of Environmental Stewardship U.S. Environmental Protection Agency, Region 1 5 Post Office Square, Suite 100, OES04-2 Boston, MA 02109-3912

Attn: Elizabeth Kudarauskas, Air Technical Unit (Mail Code OES04-2)

Be aware that if Aramark does not provide all the information required under this Reporting Requirement on the schedule set out above, EPA may order it to comply and may assess monetary penalties under Section 113 of the Act, 42 U.S.C. § 7413. Note that federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). No information provided under a claim of confidentiality should be sent by email. Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you. Please be aware that states may have different rules and regulations governing the protection of confidential business information.

If you have any questions regarding this information request, please contact Elizabeth Kudarauskas, Environmental Engineer, at (617) 918-1564 or, have your attorney call Thomas T. Olivier, Senior Enforcement Counsel at (617) 918-1737.

Sincerely,

Susan Studlien, Director

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Office of Environmental Stewardship

Enclosures

cc: Susan Ruch, MassDEP Northeast Regional Office